

** Filed **
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U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
ROMAN POLLAK, JONATHON D. WARNER, ESQ.
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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Dear Judge Chen,

I respectfully submit this clarification and request for reconsideration of the Court’s June 27, 2025 Order regarding Dkt. 516, which stated that I acted in “clear violation” of prior Court Orders by filing Plaintiff’s customer list.

With respect, I believe that the conclusion is based on a misunderstanding of how the document was submitted and what my intentions were.

The list I filed was not obtained improperly. It was **originally filed by Plaintiff’s own counsel**, as part of an affidavit submitted on behalf of Plaintiff Daniella Levi. It was publicly available on the docket, not sealed, not redacted, and not marked confidential. I did not create it. I accessed it directly through PACER while reviewing the record to understand the case. I had no reason to believe using this public record — filed by Plaintiff — would be seen as a violation.

I included the list — with my own handwritten notes — for one reason only: to defend myself against a false and damaging accusation. My notes show that **more than 60% of the firms listed were never clients of IME Companions**, and I submitted a separate list of **actual IME Companions clients** to reinforce the truth. My goal was to show the Court that Plaintiff’s claims are misleading, not to defy or undermine any order.

I want to be transparent: I have not been perfect in the past. I understand that there were prior moments in this case where my actions may have come across as defiant or inappropriate. I regret that. But this was **not one of those moments**. This filing was made in good faith, with care, using material already submitted by Plaintiff in open court. I did not try to test the Court or ignore its orders. I tried to defend myself — honestly, directly, and with evidence from the record.

If the Court now considers this material confidential under prior injunctions, I will respect that designation and ensure it is not referenced again. But I respectfully ask the Court to **reconsider the finding** that I acted in “clear violation” of its Orders. That language suggests deliberate misconduct, and it simply does not reflect the reality of this situation.

Thank you for the opportunity to clarify the record. I remain committed to defending myself with the truth and complying fully with the Court’s instructions moving forward.

Thank you for your time and consideration.

Respectfully submitted,

Safa Gelardi

Pro Se Defendant